

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Caroline Belt  
Debtor

Rushmore Servicing, as servicer for  
U.S. Bank National Association, not in  
its individual capacity but solely as  
trustee for RMTP Trust, Series 2021  
Cottage-TT-V  
v.

Caroline Belt  
Kenneth E. West - Bankruptcy Trustee  
Respondents

CASE NO.: 23-11061-amc

CHAPTER 13

Judge: Ashely M. Chan

Hearing Date:

Objection Deadline:

**CERTIFICATION OF DEFAULT**

FRIEDMAN VARTOLO, LLP, attorneys for Movant, hereby certifies that the above-captioned Debtors have failed to comply with the terms of the Stipulation approved by the U.S. Bankruptcy Judge Ashely M. Chan on October 22, 2024. A copy of the Stipulation is attached hereto as Exhibit “A”. Movant certifies that the required Notice of Default required by the Order was sent to Debtors and Debtors’ attorney on March 07, 2025 and Debtor has failed to cure the default. A copy of the Notice of Default is attached hereto as **Exhibit “B”**. In accordance with the terms of said Stipulation agreed to by the parties, the Automatic Stay is hereby lifted as to permit Movant to proceed with their State Court remedies upon Debtors’ property.

Dated: March 28, 2025

By: /s/Lauren Moyer  
Lauren Moyer, Esq.

**FRIEDMAN VARTOLO LLP**

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